

## **REMARKS**

Reconsideration of this application, as amended, is requested.

Claims 2-11 remain in the application. Claim 1 has been canceled. Each of original claims 2-7 have been amended to define the invention more clearly. Additionally, claim 4 has been amended into independent form with all of the limitations of claim 1.

The original claims were rejected under 35 USC 112, second paragraph. The Examiner objected to the phrase "can be" as being indefinite. The Examiner also rejected claim 7 due to a lack of an antecedent basis for the phrase "the respective units".

All of the claims have been carefully reviewed and amended. It is believed that the amended claims meet the requirements of 35 USC 112, second paragraph.

Original claims 1-3 and 5-7 were rejected under 35 USC 102(b) as being anticipated by JP 2000-57406 or alternatively under 35 USC 103(a) as being obvious over JP 4-360299. The Examiner identified elements in each of these references that were considered to have equivalents in the original claims. Claim 4 was not subject to a rejection under 35 USC 102 or 35 USC 103. Counsel contacted Examiner Rodriguez by telephone to inquire whether the Examiner considered claim 4 to be directed to patentable subject matter. The Examiner confirmed that claim 4 would be allowed if amended into independent form.

As noted above, original claim 4 had depended from claim 1. Claim 4 has been amended to incorporate all of the limitations of claim 1. Hence, amended claim 4 is believed to be in condition for allowance. Claims 2, 3 and 5-7 have been amended to depend from claim 4, and hence should be allowed as well.

The application includes new independent claims 8 and 10 and new dependent claims 9 and 11. It is believed that the new claims distinguish over the references cited against the original claims for the reasons set forth below.

JP 2000-57406 discloses a bill containing apparatus for changing larger bills to smaller bills and vice versa. With reference to FIGS. 1 and 3, the apparatus of JP 2000-57406 comprises a bill insertion opening 101, a bill detecting section 100a, a temporary bill storing section 100b, a bill identifying section 100, a bill transporting section 200, a one-thousand bill stacker 300a, a five-thousand bill stacker 300b, and a ten-thousand bill stacker 300c, a bill rejecting section 400b, a bill ejecting section 400a and a bill discharging opening 401.

The bills inserted through the bill insertion opening 101 are transported to and from respective stackers by the transporting section 200 with the bills being separated by gates 231 and 261 in accordance with identification at the bill identifying section 100. As shown in detail in FIGS. 6-8, the transporting section is composed of three sections for transporting each kind of bill, and which sections are linked with each other and driven by a motor 700. Each stacker section is provided with an internal bill transporter 304, 312 (see FIGS. 10 and 12) and bill pressing mechanisms as shown in FIGS. 17-19. The bill pressing mechanism presses bills against bill transporting belts 304, 312 and enables the bills to be horizontal upon transportation.

JP 2000-57406 fails to teach or suggest that the number of bill stackers corresponding to a base unit and intermediate units of the present invention is changeable. The stackers of JP 200-57406 are three in number and are not capable of being removed or added.

In contrast to JP 2000-57406, new claims 8 and 9 positively recite a bill stacking mechanism in a base unit and intermediate unit(s). The bill stacking mechanism of new claims 8 and 9 is clearly different from the bill pressing mechanism of JP 2000-57406 in that the bill pressing mechanism of JP 2000-57406 does not have the claimed bill separating member. Additionally, the bill stackers of JP 2000-57406 have nothing comparable to the claimed "movable member of the intermediate unit" that is "adapted to be coupled with the movable member of the base unit or another of the at least one intermediate unit to move therewith when the units are installed within the casing one on another." Thus, the bill handling apparatus of the subject invention is structurally different and functions differently with substantially more options for bill handling.

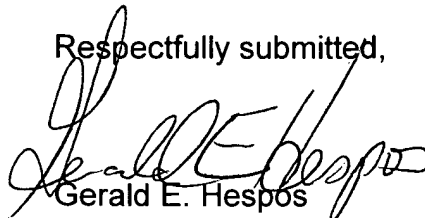
JP 2000-57406 also is deficient with respect to new claims 10 and 11. In particular, JP 2000-57406 has no suggestion of the moving mechanism of claim 10 for moving the pressure member. Accordingly, it is submitted that the invention defined by new claims 10 and 11 also is patentably distinct from JP 2000-57406.

JP 4-360299 discloses a bill dispenser with a plurality of bill containers including bill containers 25a and 25b that are arranged one on another. Transportation mechanisms 27a, 27b, 28a and 28b are coupled with each other through a gear mechanism to be driven by a driving source. JP 4-360299 teaches that the bill containers have the same structure with each other and the bill containers may be removed or added to the apparatus as shown in FIGS. 6 and 7. JP 4-360299 teaches that the bill container may be added to increase capacity of bill storage. However, the additional container has the same structure as the remaining container. The apparatus of JP 4-360299 has no mechanism for receiving bills and transporting received bills into bill containers in the

claimed base unit and intermediate unit. Accordingly, it is submitted that the invention defined by new claims 8-11 is not taught or suggested by JP 4-360299.

In summary, it is believed that the amended and new claims are patentable over the prior art and allowance is solicited. The Examiner is urged to contact applicants attorney at the number below to expedite the prosecution of this application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gerald E. Hespos", is written over the typed name.

Gerald E. Hespos

Atty. Reg. No. 30,066

Customer No. 001218

CASELLA & HESPOS LLP

274 Madison Avenue - Suite 1703

New York, NY 10016

Tel. (212) 725-2450

Fax (212) 725-2452

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